

1 Guido Saveri (22349)
2 *guido@saveri.com*
3 R. Alexander Saveri (173102)
4 *rick@saveri.com*
5 Geoffrey C. Rushing (126910)
6 *grushing@saveri.com*
7 Cadio Zirpoli (179108)
8 *cadio@saveri.com*
9 Matthew D. Heaphy (227224)
10 *mheaphy@saveri.com*
11 SAVERI & SAVERI, INC.
12 706 Sansome Street
13 San Francisco, CA 94111
14 Telephone: (415) 217-6810
15 Facsimile: (415) 217-6813

16 *Lead Counsel for Direct Purchaser Plaintiffs*

17 Mario N. Alioto (56433)
18 Lauren C. Capurro (241151)
19 TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
20 2280 Union Street
21 San Francisco, CA 94123
22 Telephone: (415) 563-7200
23 Facsimile: (415) 346-0679
24 E-mail: *malioto@atap.com*
25 *laurenrussell@atap.com*

26 *Lead Counsel for the Indirect Purchaser Plaintiffs*

27 **UNITED STATES DISTRICT COURT**
28 **NORTHERN DISTRICT OF CALIFORNIA**
29 **SAN FRANCISCO DIVISION**

30 IN RE: CATHODE RAY TUBE (CRT)
31 ANTITRUST LITIGATION

32 Master File No. 07-CV-5944-JST

33 MDL No. 1917

34 This Document Relates to:

35 **STIPULATION AND [PROPOSED] ORDER**
36 **RE AMENDED JURISDICTIONAL**
37 **DISCOVERY DEADLINE, BRIEFING**
38 **SCHEDULE, AND HEARING DATE**

39 *ALL ACTIONS*

40 Judge: Honorable Jon S. Tigar

1 Direct Purchaser Plaintiffs (“DPPs”), Indirect Purchaser Plaintiffs (“IPPs”) (together with
2 DPPs, “Plaintiffs”), and Defendants Irico Display Devices Co., Ltd. and Irico Group Corporation
3 (together, the “Irico Defendants” or “Irico”), by and through the undersigned counsel, hereby
4 stipulate as follows:

5 WHEREAS, on May 1, 2018, the Court entered a stipulation and order setting a schedule
6 for jurisdictional discovery, motion briefing and a hearing on jurisdictional issues in the DPP
7 Action, ECF No. 5282;

8 WHEREAS, on July 18, 2018 and August 13, 2018, the Court entered orders setting a
9 schedule for jurisdictional discovery in the IPP Action, and motion briefing and a hearing on
10 jurisdictional issues in the IPP Action, and continued the hearing date in the DPP Action, ECF Nos.
11 5317 and 5323;

12 WHEREAS, on September 14, 2018, ten days before the scheduled start of depositions in
13 Hong Kong, the Irico Defendants produced a substantial number of Chinese-language documents;

14 WHEREAS, the parties agree that DPPs and IPPs need additional time to review and
15 analyze, and potentially translate and prepare, the newly-produced documents for use in the
16 depositions;

17 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between counsel
18 for Plaintiffs and the Irico Defendants:

19 1. The parties shall meet and confer to reschedule the previously set depositions to
20 occur prior to the close of discovery;

21 2. Jurisdictional discovery shall close on November 16, 2018;

22 3. Irico’s opening motion(s) regarding jurisdictional issues in the IPP Action shall be
23 due on or before November 2, 2018;

24 4. DPPs’ opposition to Irico’s motions in the DPP Action (ECF Nos. 5312, 5313) shall
25 be due on or before November 19, 2018;

26 5. Irico’s reply in support of its motions in the DPP Action shall be due on or before
27 December 19, 2018;

1 6. IPPs' opposition to Irico's motion(s) in the IPP Action shall be due on or before
2 December 14, 2018;

3 7. Irico's reply in support of its motion(s) in the IPP Action shall be due on or before
4 January 14, 2019; and

5 8. The hearing on the motion shall be set for January 31 ~~or February~~ 7, 2019 at 2 pm,
6 or at some other date and time convenient for the Court.

7 Dated: October 2, 2018

8 /s/ R. Alexander Saveri

9 Guido Saveri (22349)
10 R. Alexander Saveri (173102)
11 Geoffrey C. Rushing (126910)
12 Cadio Zirpoli (179108)
13 Matthew D. Heaphy (227224)
14 SAVERI & SAVERI, INC.
15 706 Sansome Street
16 San Francisco, CA 94111
17 Telephone: (415) 217-6810
18 Facsimile: (415) 217-6813

19 *Lead Counsel for Direct Purchaser Plaintiffs*

20 /s/ Mario N. Alioto

21 Mario N. Alioto (56433)
22 Lauren C. Capurro (241151)
23 TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
24 2280 Union Street
25 San Francisco, CA 94123
26 Telephone: (415) 563-7200
27 Facsimile: (415) 346-0679
28 E-mail: malioto@tatp.com
laurenrussell@tatp.com

29 *Lead Counsel for the Indirect Purchaser Plaintiffs*

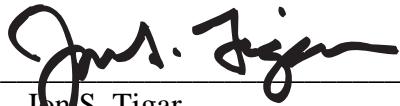
30 /s/ Stuart C. Plunkett

31 John Taladay (*pro hac vice*)
john.taladay@bakerbotts.com
32 Erik T. Koons (*pro hac vice*)
erik.koons@bakerbotts.com
BAKER BOTT LLP
1299 Pennsylvania Ave., NW
33 Washington, D.C. 20004
34 Telephone: 202.639.7700
35 Facsimile: 202.639.7890

36 Stuart C. Plunkett (State Bar No. 187971)

37 stuart.plunkett@bakerbotts.com
BAKER BOTT LLP
101 California Street, Suite 3070
38 San Francisco, California 94111
39 Telephone: (415) 291-6200
40 Facsimile: (415) 291-6300

41 *Attorneys for Defendants Irico Group Corp.
and Irico Display Devices Co., Ltd.*

42 By: 

43 Jon S. Tigar
United States District Judge

44 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

45 Dated: October 9, 2018